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*Attorneys for MOAC Mall Holdings LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

	)	Chapter 11
In re:	)	Case No. 18-23538 (RDD)
	)	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	)	(Jointly Administered)
	)	
Debtors. <sup>1</sup>	)	

**DECLARATION OF RICHARD HOGE  
IN OPPOSITION TO THE PROPOSED  
ASSUMPTION AND ASSIGNMENT OF THE MOAC LEASE**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

**Richard Hoge** declares as follows of his personal knowledge:

1. I am the Executive Vice President of Operations of MOAC Mall Holdings, LLC (“MOAC”). MOAC and its affiliate entities own and manage Mall of America® (the “Mall”), the nation’s premier shopping center, which is located in Bloomington, Minnesota.

### **QUALIFICATIONS**

2. My expertise in the retail and shopping-center industries and comprehensive understanding of Mall of America come from decades of experience working with the organization over the course of its history. I have firsthand knowledge and experience of every level of the business. I have a two-year technical degree in engineering and heating, ventilation, and cooling and previously held certifications in refrigeration, though they are no longer active. With this education, I started as a second-shift general maintenance technician at Mall of America in 1992. I quickly advanced to a HVAC operator position, and by around 1995, I was supervising the engineering and electrical departments. I became the manager of technical services in 2000 and held this role until I was promoted to Director of Technical Services and Construction, a position I held from 2007 until 2012 when I was promoted to Vice President of Operations. In 2015 I was promoted to Executive Vice President of Operations.

3. A copy of my resume is attached to this Declaration as **Exhibit A**.

4. In my current position as Executive Vice President of Operations, I manage the entire operations for Mall of America. Mall of America is the premier retail entertainment destination in the United States with 99% brand recognition. We have strategically grown the project to more than 5.6 Million Square feet. The project produces sales in excess of \$1.1 Billion, and has an overall economic impact to the State of Minnesota in excess of \$3 Billion annually. Mall of America employs over 13,000 people with our 520 retailers, entertainment, and culinary

offerings, and directly employs 1,200 of these people. The annual traffic at Mall of America is in excess of 40 Million visitors, of which 60 percent are local (within 150 miles) and the other 40 percent are tourists, with over 5 Million of those tourists coming from international destinations. We are in a position to break ground on the nation's largest world class indoor waterpark facility in early 2020. This is a \$250 Million project that will continue to strengthen our position for continued success. This project is a unique public-private partnership that is important to not only Mall of America's future, but also to the City of Bloomington and the State of Minnesota and our future collective success. This project has already spurred additional development including hotel and parking, which is in excess of the \$250 Million investment we are currently advancing. Mall of America continues to be a very responsible corporate citizen, contributing in excess of \$12 Million in cash and in-kind donations for community and non-profit activity annually.

5. The operational side of the business includes, but is not limited to finance, information technology, construction, human resources, technical operations, maintenance operations, housekeeping, security, theme park attractions operations, guest services, retail, and legal. I am a member of Mall of America's executive leadership team that reports directly to the ownership. I oversee strategic direction and steering for the entire property along with our Senior Vice President of Marketing and Business Development.

6. With regard to strategic planning, the executive team works together with ownership and the leasing team to identify and conduct due diligence on potential tenants and to analyze what tenants will best fit the property. We carefully consider any exceptions to the traditional shopping-center type venture, such as the two hotels or the office building attached to Mall of America, and approve such projects only in exceptional circumstances. For new projects,

my department completes the development work and prepares the financial *pro formas* for these projects. Once the project is completed, my department operates the new developments that we own.

7. My department is involved with all aspects of our leases, including the financials and cash management, working directly with tenants and prospective tenants, and participating in negotiations with current and prospective tenants. My teams work with the tenants through construction completion and store opening. Once tenants are operational, we continue to work with tenants on a continuing basis to help them grow and market both their business and Mall of America.

8. Through this experience, I have significant expertise in the retail and shopping-center industry. My work necessarily requires staying current with industry trends by reading trade publications, attending conferences, and having my team gather and share industry knowledge. We are members of the Building Operators Management Association (“BOMA”) and the International Council of Shopping Centers (“ICSC”). As leaders in the industry, we are covered in many trade magazines, and we are regularly interviewed in connection with those articles. At our quarterly tenant meetings, I update the tenants on new concepts and changes in the industry and community that might impact their businesses and provide tenants with tools that they need to be successful.

9. Because of my knowledge of practically every aspect of the Mall, I have testified in depositions and court proceedings with regard to the Mall of America building and our operations. Accordingly, I am qualified to testify regarding Mall of America as well as the shopping-center industry more broadly.

## **MALL OF AMERICA**

10. Through painstaking, strategic investments and development, Mall of America continues to be successful in an industry that is struggling from the impact of online shopping and other market changes. Other malls have closed, and the occupancy and foot traffic at shopping centers in the area are down. In contrast, Mall of America's foot traffic does not drop but continues at a very high rate. Mall of America provides the "gold standard" shopping center experience and wants to continue to do so long into the future.

## **KEYS TO MALL OF AMERICA'S SUCCESS**

11. Mall of America succeeds by directly supporting the success of our tenants, strategically managing and enhancing our mix of tenants and attractions, and leading changes in the industry. Class A shopping centers like Mall of America depend on their ability to attract flagship retailers and those retailers that need bricks and mortar to showcase their product. This ability does not come by chance—it is by design.

12. Our tenants do not sublet from independent third parties, meaning we are actively involved and deeply engaged with our tenants. We meet with our tenants as a whole quarterly to provide detailed updates on mall operations and industry-relevant information. We work closely with our tenants to ensure they are optimally positioned within Mall of America. We provide training and share traffic analysis and predictions and advice on how tenants can use those predictions. We recently formed a partnership with a staffing company to assist tenants who were having staffing challenges. Ensuring that the tenants' stores are fully staffed and able to provide high-quality customer service experiences is one of the many reasons why Mall of America continues to be a global attraction. Where our tenants succeed, we succeed. Our direct landlord-tenant relationship with our tenants is a key, bargained-for benefit that would be lost if

Transform Leaseco LLC (with its affiliate Transform Holdco LLC, "Transform") is allowed to assume the Sears lease and then sublet it to a third party.

13. We meticulously manage our tenant mix and mix of attractions. As a landlord, we have to position our tenants for success. We do not just place a tenant because we have a space available; we look at how that tenant will work in a space and fit with the other tenants nearby. We actively move tenants to ensure optimal placement. We also continue to open strategic attractions, such as the previously discussed waterpark we are in the process of developing. It is the whole package of carefully planned tenant and attraction mix that keeps Mall of America strong and relevant.

#### **TENANT OPERATING PERFORMANCE**

14. Operating performance is a critical consideration when we conduct due diligence on potential tenants. We do not want to invest in a tenant and buildout and not have a long-term, high quality operator. We need to ensure that they are an operator that is going to drive traffic and interest in Mall of America for years to come. We are obviously going to look at a potential tenant's financials, but that is only one piece of the equation.

15. When we are looking at a prospective tenant's operating performance, we look at their historical operations and how they are operating today. We visit their flagship venues to see what their operations look like. We carefully evaluate the quality of operations by watching and interacting with customers and employees. For all of our tenants, we demand quality finish, quality maintenance, quality operations, and quality staff. We monitor social media feeds and online reviews and look at how a potential tenant is performing from a social perspective. Any new tenant needs to be able to match the experience and quality of Mall of America and must be

consistent with our brand and our commitment to success. The bigger the space we have to fill, the more difficult and critical this assessment of operational performance becomes.

#### **COMPARATIVE OPERATIONAL PERFORMANCE OF SEARS AND TRANSFORM**

16. The operational performance Sears of 1991 is a great example of what we look for in a tenant, particularly one for a critical space like our anchor spaces. In 1991, Sears was everywhere and had virtually universal brand recognition. Nearly every American family had shopped at Sears. It was known as a destination for almost anything you would need, be it appliances, lawn tractors, a wrench set, school shopping, clothing or home furnishing. Sears was a powerhouse. Its big-book catalog was the paper equivalent of Amazon.com. Sears's aggressive advertising drove customers to its stores. This type of operational performance would, and did, drive traffic to Mall of America and supported our brand as the gold standard shopping experience.

17. In contrast, the operations we observed and experienced at Sears in recent years have fallen far short of our expectations for any tenant, much less an anchor. Even though other retailers achieve success at Mall of America in the face of market challenges, Sears did not have the operational performance necessary to succeed. The level of quality had diminished dramatically. Products were frequently out of stock on the shelves, and the store was not well managed or maintained. Sears did not provide the guest experience that our customers expected and deserved. We had many conversations with Sears trying to figure out how to get them to address these issues. Sears's poor operational performance was clear evidence of the company's downward trend, so we even had discussions to try to plan ahead for Sears's future demise. We would never provide an anchor store lease to a potential tenant with operations like Sears's in the last several years. Regardless of whether such a tenant could pay the rent and common area



maintenance expenses, its poor operational performance would not be able to provide the customer experience and visitor draw that is essential for a space of that size and importance.

18. Given that Transform is a new entity, we do not have any direct historical performance to evaluate to consider the operational performance of Transform. However, Transform's management appears to be made up of the same executives who were in charge of Sears during its decline into bankruptcy. Their business plans have offered no indication that Transform would be able to be any more successful than Sears was in recent years.

19. Moreover, Transform has unequivocally stated that it will not directly operate a retail store in the Sears space at the Mall of America, but rather intends to sublease the space to some unknown and unspecified future tenant. Thus, the operational performance of the hypothetical future tenant becomes as important, if not more important, than the performance of Transform. Without knowledge and information about the operational performance of the future tenant, it is impossible for Mall of America to have adequate assurance that the occupant of the space will provide similar operational performance to that of Sears in 1991.

### **TENANT MIX**

20. Tenant mix is another critical component to Mall of America's success and our tenant vetting process. Proper tenant mix, including placement of tenants, is critical to ensure their success. Some shopping centers will simply fill a vacant space with any available tenant. We do not do this. We are willing to turn away potential tenants that do not fit our mix and, therefore, are out of harmony with our operation as a first-class shopping center. Sometimes, we will try tenants on a temporary basis to gauge their ability to succeed, though we would not do so for an anchor tenant space such as the one occupied by Sears. We have also moved tenants around to ensure optimal placement.



21. For example, we recently moved a tenant from a 20,000 square foot space to a 40,000 square foot space, because they wanted to put a flagship store at Mall of America based on their success here. We implemented our plan to backfill into the vacated space to bolster that area of the Mall. We keep our finger to the pulse of the mall and are constantly trying to reconfigure to ensure the performance and success of Mall of America, including through the success of its tenants.

22. We have turned away potential tenants, such as certain discount clothing retailers, who do not demonstrate the quality expected in a world-class shopping center—even though they would love to be here. We have also turned away potential tenants who would hurt our brand of being a family-friendly shopping center. For example, we recently turned away a potential tenant that sold erotic candy and graphic t-shirts not appropriate to Mall of America's brand. We understand Mall of America's demographics and who we are striving to have come to Mall of America. We will not rent to a tenant that is not going to help put Mall of America in a better position.

23. On the other hand, we actively pursued tenants that did not exist in the region or marketplace before they came to Mall of America. A current fast-fashion retailer only existed on the East and West Coast in the United States before we persuaded them to open a store at Mall of America. We do not fill spaces with the first available tenant or lease them to whomever can pay the highest rent. Instead, we actively curate the tenant mix to maximize the draw to customers. Mall of America succeeds because, anytime we bring in a new tenant or experience, we look at how it is going to improve our position in the marketplace and drive new traffic that may not already be coming to Mall of America.

24. Once again, Transform does not intend to directly operate the Sears space, but instead seeks to sublease it to unknown and unspecified future tenant. Without proof of the identity and planned operations of this future tenant, it is impossible for Mall of America to have adequate assurance that an assignment of the Sears Lease to Transform will not detrimentally impact the tenant mix of the Mall of America shopping center. Because Transform's sole incentive comes from maximizing rent, Transform does not share our priorities with regard to tenant mix and operational performance.

#### **DETRIMENTAL EFFECT OF VACANCY**

25. A space going vacant, or "dark," in Mall of America disrupts the balance of the tenant mix, is detrimental to the shopping center, and impacts traffic flow and sales in that area of the property. This is true of any shopping center, and the loss of an anchor tenant can be catastrophic. Accordingly, the Sears space being dark at Mall of America creates a real challenge. As an anchor space, the Sears space should be a primary draw of traffic to Mall of America as a whole and create a hot spot of activity in that area of the property. Because the Sears space has three floors connected to the parking ramp and additional entrances from surface lots, the space provides primary access points to Mall of America when it is open. Today, these key access points are closed off, and the area has become a dead zone. This has changed the traffic flow in the property and is impacting tenants in that area. Our tenants throughout Mall of America are talking to us regularly and are anxious to know when the space is going to be operational again.

26. For a space the size of Sears, we would expect it to be operational again within a year of going dark, taking into account the time to identify tenants, obtain the necessary approvals, sign a lease, build out the space, and turn over and open for operation.

### **THE SEARS LEASE AND THE RECIPROCAL EASEMENT AND OPERATING AGREEMENT**

27. To protect its interests and those of the other tenants of Mall of America, MOAC enters into detailed contracts with all tenants of the Mall of America. Sears was no exception.

28. Effective May 30, 1991, MOAC and Sears entered into the Lease Construction and Operation Agreement, a true and correct copy of which has been marked as Exhibit 1-MOAC (the "Lease").

29. Effective May 30, 1991, MOAC and Sears entered into the Agreement to Grant Option to Lease governing the third floor of the space, a true and correct copy of which has been marked as Exhibit 2-MOAC (the "Third-Floor Addendum").

30. The Lease adopts and incorporates provisions from a contemporaneously executed Amended and Restated Reciprocal Easement and Operating Agreement, effective May 30, 1991 between Nordstrom, Inc., Macy's California, Inc., Sears, and MOAC, a true and correct copy of which has been marked as Exhibit 3-MOAC (the "REA").

### **LEASE RESTRICTIONS**

31. Our leases and the incorporated REA help control tenant mix at Mall of America. While Mall of America boasts a wide array of shopping experiences and attractions, the addition of new experiences or other changes to tenant mix require approval from anchor tenants, from MOAC, and sometimes even from the City of Bloomington. In other words, a space cannot be filled with just any interested tenant even if that tenant might be a type of tenant that already exists at Mall of America or is sometimes found at other shopping centers. Our anchor department stores, including the Sears space, have leases requiring the space to be used in a way that is in harmony with and not harmful to our operations as a first-class shopping center. The leases contain explicitly prohibited uses, including but not limited to pet shops, laundromats and

dry cleaners, offices, and warehouses. The agreements and city ordinances impose restrictions on interior and exterior signage, the exterior appearance of the building, parking impacts, and changes to the courtyards at inside entrances to the anchor locations that impact traffic flow.

32. As an example of how this works practically, developing the former Bloomingdale's space required changes to the outward appearance of the building. In addition to approval from MOAC, the new project needed approval from Macy's, Nordstrom, and Sears, as well as changes to city ordinances that control the exterior appearance and signage, changes to the classification of the tax parcel, and integration into the center parcel. The change to this anchor space also required a negotiated exception from the REA to avoid breaching its operating covenants. Obtaining these approvals required reassuring those other tenants and the city that the redevelopment would provide additional draw and value to Mall of America and the community. MOAC also had to commit to meet new parking demands if there was a shortfall in parking. Any use of the Sears location that differs materially from Sears's prior use would likely require similar approvals.

33. On behalf of MOAC, I oversaw similar approval processes to develop the hotels and office building attached to Mall of America. Any office building or hotel in the Sears space would require changes to the entire exterior of the building to allow for windows and signage. Parking would also have to be changed because, whereas Mall of America uses shared parking, hotels and office buildings want adjacent and exclusive parking. These and other changes require MOAC approval and coordination to obtain required approvals from the other anchor tenants and ordinance changes from the city. Because there are already two hotels and an office building adjacent to Mall of America, adding another hotel or office building in the Sears space would be

out of harmony with the first-class shopping center's operation and face an uphill approval battle from the City of Bloomington and the other anchor tenants.

#### **OUTSTANDING AMOUNTS DUE**

34. I have calculated that, as of August 22, 2019, \$699,570.11 will be due in connection with the Lease, plus attorneys' fees and expenses incurred after July 31, 2019. A true and correct copy of a summary of these amounts has been marked as Exhibit 5-MOAC. I understand that Transform has agreed to bear all occupancy costs related to the Lease through August 31, 2019, and has tendered an initial payment of \$578,736.39. Therefore, \$122,063.52, plus fees and expenses incurred after July 31, 2019, remains due in connection with the lease.

#### **CONCLUSION**


35. Mall of America achieved and maintains its status as the gold standard shopping center through meticulous, strategic management of its tenant mix. This mix requires the highest quality operational performance throughout Mall of America—including from its tenants. All potential tenants must positively contribute to the Mall of America brand—which is even more essential with our anchor spaces.

36. Given the uncertain operational performance of Transform, the numerous contractual obligations in the Lease, the Third-Floor Addendum, and the REA, and the importance of preserving tenant mix, allowing the Sears space to be assigned to Transform and then sublet to an unknown tenant for unspecified purposes would impose both immediate and long-term damage to the Mall and its other tenants.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
and correct.

Dated: August **16**, 2019

Bloomington, Minnesota

  
\_\_\_\_\_  
Richard Hoge

4813-4284-3551, v. 5

## **Exhibit A**

### **Richard J. Hoge**

8347 Isleton Ct S  
Cottage Grove, MN 55016

#### **Executive Vice President Operations**

2015 – present

#### **Vice President Operations**

2012 –2015

#### **Mall of America**

Innovative business professional with expertise in operations, strategic planning, business development, and management. Recognized as a strong leader with the ability to manage, communicate and effectively work with all levels of a large corporation as well as partners, public officials and shareholders.

##### **Areas of Responsibility:**

- Directly responsible for the day-to-day management of the largest retail/entertainment venue in the United States that draws over 40 million guests annually and produces annual sales in excess of \$1 billion dollars.
- Direct reports include Finance, IT, Legal, Security, Human Resources, Technical Operations, Building Operations, Construction, Amusement Operations and Guest Services. Total 1200 employees
- Create and direct strategic plan and direction for Mall of America in collaboration with Ownership with overall corporate focus on Guest Experience, Team Member Experience, Tenant Success, Sales, Traffic and NOI.
- Create and manage annual overall property operating budgets with revenues in excess of \$210 Million and Operating Expenses in excess of \$110 Million.
- Curate and manage relationships across the private and public sectors, including local, state and national government leaders

#### **Director Technical Services and Construction**

2007 – 2012

#### **Mall of America**

Manage and coordinate the activities of the Technical Services and Construction Departments in order to maintain and improve the owner's property asset including building, mechanical, electrical systems. Common area renovations, theme park renovations and rebranding, tenant coordination and new developments. Ensure a world class and safe environment for 40 Million visitors and 13,000 employees.

##### **Areas of Responsibility:**

- Develop annual budgets, monitor and control department operating expenses. Develop, implement and manage maintenance and service programs, processes and procedures, for theme park rides, building, mechanical, electrical and life/safety systems.
- Oversee building utility consumption, develop and implement energy management strategies, internally and with utility providers.
- Develop and manage property capital projects, renovations and redevelopment.
- Assure compliance and documentation requirements with building regulations administer by local and national governments.
- Manage and coordinate cooperative relationships with tenants, building officials, vendors, service provider, trade partners and other MOA Departments.



### **Technical Services Manager**

2000 - 2007

Manage and coordinate the activities of the Technical Services Department in order to maintain and improve the owner's property asset including building, mechanical, and electrical systems. Provide a safe and comfortable environment for guests and occupants.

#### **Areas of Responsibility:**

- Develop annual budgets, monitor and control department operating expenses. Develop, implement and manage maintenance and service programs, processes and procedures, for the building, mechanical, electrical and life/safety systems.
- Oversee building utility consumption, develop and implement energy management strategies, internally and with utility providers.
- Develop and manage property capital projects
- Assure compliance and documentation requirements with building regulations administer by local and national governments.
- Manage and coordinate cooperative relationships with tenants and other MOA Departments.

### **Engineering/Electrical Supervisor**

1995 - 2000

Lead team of Technicians on preventative maintenance and service of electrical and engineering and building systems equipment. To ensure all Mall of America electrical and engineering team members are properly trained in operation, service and maintenance of electrical systems. Incumbent directly supervises team leaders and team members, and functions as a working supervisor as needed.

#### **Areas of Responsibility:**

- Responsible for maintenance, operation and service of Primary Electrical distribution, all lighting equipment and luminaires interior and exterior.
- Responsible for task assignment, performance evaluation and task assignment/inspection.
- Analyzes departmental needs, problems, and implement solutions.
- Develops and provides documentation to ensure accurate communication to other supervisors, team leaders, team members, manger and other departments. Work directly with other departments on coordination and implementation of events and their related power needs.
- Develop and implement Capital projects.
- Assists manager in preparing and monitoring annual budget.

### **Building Systems Team Lead**

1994 - 1995

### **Building Systems Technician**

1993 - 1994

Lead team of technicians on operations and service of building management systems to ensure all Mall of America Engineering Department team members are properly trained in operation, service and maintenance of building operations systems. Position is accountable for establishing and administering a comprehensive training plan and establishing achievable goals in the areas of building systems, fire and life safety, controls and compliance.

#### **Areas of Responsibility:**

- In charge of contractor's background checks, ensure tenant contractors remodels are meeting standards from an HVAC/Electrical, Life and Fire Safety and metering perspective.
- Maintain MOA metering system, oversee MOA MBS and Andover system, oversee mechanical and fire safety using the Simples System, ensure roof detail is meeting standard.

- Assist in creating the annual budget and provide input on hiring decisions.

**HVAC Operator 1**

1992 - 1993

Assist in the operation, maintenance and repair of the HVAC systems in the facility.

- Perform preventative maintenance, trouble shooting and service on all mechanical and electrical equipment.
- Maintains water chemical treatment.

**Maintenance Worker 1**

July 1992

Ensure guests to Mall of America have a positive shopping and entertainment experience. This position is accountable for maintaining the facility in good repair.

- Completes maintenance and repairs throughout property.
- Set up promotion staging, performs other construction/assembly tasks.